

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

x

ROBERT H. BURCH, Individually and on : Civil Action No. 1:08-CV-01029-WHP  
Behalf of All Others Similarly Situated, :  
Plaintiff, :  
vs. :  
SLM CORPORATION, et al., :  
Defendants. :  
RUSSELL PATRICK, Individually and on : Civil Action No. 1:08-cv-02463-WHP  
Behalf of All Others Similarly Situated, :  
Plaintiff, :  
vs. :  
SLM CORPORATION, et al., :  
Defendants.

---

x

NOTICE OF MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF  
AND FOR APPROVAL OF SELECTION OF LEAD COUNSEL

PLEASE TAKE NOTICE that Sheet Metal Workers' Local No. 80 Pension Trust Fund ("SMW 80") , will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): (i) consolidating the Actions; (ii) appointing SMW 80 as Lead Plaintiff; (iii) approving SMW 80's selection of the law firm of Coughlin Stoia Geller Rudman & Robbins LLP to serve as Lead Counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this Motion, SMW 80 submits herewith a Memorandum of Law and Declaration of David A. Rosenfeld dated March 31, 2008.

DATED: March 31, 2008

COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP  
SAMUEL H. RUDMAN  
DAVID A. ROSENFELD

---

/s/ David A. Rosenfeld

David A. Rosenfeld

58 South Service Road, Suite 200  
Melville, NY 11747  
Telephone: 631/367-7100  
631/367-1173 (fax)

[Proposed] Lead Counsel for Plaintiff

**CERTIFICATE OF SERVICE**

I, David A. Rosenfeld, hereby certify that on March 31, 2008, I caused a true and correct copy of the attached:

Notice Of Motion For Consolidation, Appointment As Lead Plaintiff And For Approval Of Selection Of Lead Counsel;

Memorandum In Support Of The Motion Of SMW 80 For Consolidation, Appointment As Lead Plaintiff And For Approval Of Selection Of Lead Counsel; and

Declaration Of David A. Rosenfeld In Support Of The Motion Of SMW 80 For Consolidation, Appointment As Lead Plaintiff And For Approval Of Selection Of Lead Counsel

to be served: (i) electronically on all counsel registered for electronic service for this case; and (ii) by first-class mail to all additional counsel on the attached service list.

---

*/s/ David A. Rosenfeld*  
David A. Rosenfeld

SALLIE MAE

Service List - 3/31/2008 (08-0020)

Page 1 of 1

**Counsel For Defendant(s)**

Laurie B. Smilan  
Abid R. Qureshi  
Latham & Watkins LLP  
11955 Freedom Drive, Suite 500  
Reston, VA 20191-5651  
703/456-1000  
703/456-1001(Fax)

Jeffrey G. Hammel  
Latham & Watkins LLP  
885 Third Avenue, Suite 1000  
New York, NY 10022-4802  
212/906-1200  
212/751-4864(Fax)

Peter A. Wald  
Latham & Watkins LLP  
505 Montgomery Street, Suite 2000  
San Francisco, CA 94111  
415/391-0600  
415/395-8095(Fax)

**Counsel For Plaintiff(s)**

Samuel H. Rudman  
David A. Rosenfeld  
Coughlin Stoia Geller Rudman & Robbins LLP  
58 South Service Road, Suite 200  
Melville, NY 11747  
631/367-7100  
631/367-1173(Fax)

Corey D. Holzer  
Michael I. Fistel, Jr.  
Holzer Holzer & Fistel, LLC  
1117 Perimeter Center West, Suite E-107  
Atlanta, GA 30338  
770/392-0090  
770/392-0029(Fax)

Alfred G. Yates, Jr.  
Law Offices of Alfred G. Yates, Jr., P.C.  
519 Allegheny Building  
429 Forbes Avenue  
Pittsburgh, PA 15219  
412/391-5164  
412/471-1033(Fax)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

x

ROBERT H. BURCH, Individually and on : Civil Action No. 1:08-CV-01029-WHP  
Behalf of All Others Similarly Situated, :  
Plaintiff, :  
vs. :  
SLM CORPORATION, et al., :  
Defendants. :  
RUSSELL PATRICK, Individually and on : Civil Action No. 1:08-cv-02463-WHP  
Behalf of All Others Similarly Situated, :  
Plaintiff, :  
vs. :  
SLM CORPORATION, et al., :  
Defendants.

---

x

[PROPOSED] ORDER CONSOLIDATING THE ACTIONS, APPOINTING LEAD  
PLAINTIFF AND APPROVING SELECTION OF LEAD COUNSEL

Having considered the motion of the Sheet Metal Workers' Local No. 80 Pension Trust Fund ("SMW 80") for Consolidation, Appointment as Lead Plaintiff and Approval of Selection of Lead Counsel and the Memorandum of Law and Declaration of David A. Rosenfeld, in support thereof, and good cause appearing therefore:

1. The Actions are hereby consolidated;
2. SMW 80 is hereby appointed Lead Plaintiff for the Class pursuant to Section 21D of the Securities Exchange Act of 1934; and
3. The law firm of Coughlin Stoia Geller Rudman & Robbins LLP is hereby appointed Lead Counsel.

IT IS SO ORDERED.

DATED: \_\_\_\_\_

---

THE HONORABLE WILLIAM H. PAULEY, III  
UNITED STATES DISTRICT JUDGE